

LONG COMMUNICATIONS, LLC

Hickory, North Carolina

WHKY-TV

Political Disclosure Statement

2016 Political Advertising Lowest Unit Rate Periods:

NC Primary: January 30, 2016 through March 15, 2016

NC Congressional Primary: April 23, 2016 through June 7, 2016

NC General: September 9, 2016 – November 8, 2016

WHKY-TV

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WHKY Political Broadcast Advertising Disclosure Statement

The following sets forth the policies and practices of TV Station WHKY regarding the sale of political time. The station is referred to below as the "Station". The following practices apply to purchases of advertising time for "use" by legally qualified candidates for public office. In order to qualify for this treatment, candidates or their representatives may be asked to demonstrate that they are legally qualified. This Disclosure Statement is provided for general information as required by the rules and regulations of the Federal Communications Commission ("FCC"), and is not intended to be a part of any advertising sales contract, which is governed by applicable law and its own terms. Practices described herein are subject to change at the Station's discretion, to the extent permitted by law. Legally qualified federal candidates are entitled to purchase time on the Station during their election campaigns. The Station will consider all requests for such time and will make reasonable accommodations to meet such requests. Although a federal candidate has the right to reasonable access to the facilities of the Station for the airing of political advertisements, the Station retains the right to limit the amount of time sold to a candidate and has ultimate discretion with respect to the placement of political advertisements. The Station will grant access to specified state and local candidates based, in the station's sole discretion, on the public interest in the election and inventory. For a determination as to whether the Station will make time available for sale for certain local or state races, see Station Contact: Patty Guthrie, Sales Manager, (828) 485-5521, 526 Main Avenue, SE, Hickory, NC 28602.

During the 45 days preceding a primary election and the 60 days before a general election, the Station charges candidates in the respective elections the "lowest unit charge: for an advertisement if the advertisement constitutes a "use" of the Station's facilities, as defined by the FCC. During any time outside of the 45-day and 60-day periods, the charges for political advertisements constituting a "use" are set so as to be no higher than those charged other advertisers for comparable use of the Station's facilities. Any political advertisement that is not a "use," including any advertisement purchased by a non-candidate or any advertisement dealing with non-candidate ballot issues, is sold at prevailing commercial rates. If a political advertisement constitutes a use, the Station will provide opposing candidates with "equal opportunities," as established by federal law, to use the facilities of the Station. No federal candidate will be entitled to receive the station's lowest unit charge unless the candidate provides the station with a certification that the candidate will not make any direct reference to another candidate for the same office in any broadcast unless the broadcast complies with S315(b)(2)(D) of the Communications Act, as amended by the Bipartisan Campaign Reform Act of 2002.

The terms and conditions applicable to political advertising on the Station are as follows:

1. **Rates.** The Station sells :10/:15, :30 and :60 lengths for each specified class of time as reflected on the attached rate card. Most rates for both commercial and political advertising time sold on the Station are arrived at on an individually negotiated basis. Individually negotiated spot packages are equally available for purchase by political candidates. Negotiated buys may, for example, include spots in a number of different rotations or dayparts and combinations of different classes of spots. Rates for most classes of time vary on a daily basis, based on supply and demand. The classes of advertising time offered to commercial advertisers are:
 - a. Fixed-Position Spots
 - b. ROS (Run-of-Schedule) Spots
 - c. Package Plans
2. **Identification.** All ads must comply with the identification requirements of S317 of the Communications Act. The Station reserves the right to insert such identification into any advertisement that fails to include the requisite identification even if the insertion of the identification causes a portion of the advertisement to be deleted. For a federal candidate to receive the lowest unit charge for the class of time purchased, all ads that refer to opposing candidates must contain a statement that is read by the candidate which identifies the candidate and office the candidate is seeking, and states that the candidate approved the broadcast.
3. **Orders.** All orders for political time will not be considered firm for broadcast clearance until the following have been provided to the Station:
 - (a) Completed and signed Agreement Form for Political Broadcasts (PB-18), as supplied by the Station and BRCA Political Record which lists the directors or officers of the political entity purchasing the time.
 - (b) All orders for political advertising must be accompanied by (net) payment at least two (2) business days in advance of the broadcast of the first announcement scheduled in any political order or contract. In the event that the Station agrees to accept announcements for independent political committees or for issue advertising, all such air time must be paid for in full in advance at the time that an order is placed. All political spots or programs require payment by check or debit/credit card. Cash cannot be accepted. All political spots or programs require a minimum of two (2) business days' advance written notice to the Station for cancellation of an order.

- (c) Where the purchase is made by a corporation, committee, association or other unincorporated group or other entity, a list of the entity's chief executive officers or the members of the executive committee, and of the entity's board of directors.
 - (d) Where doubt exists on the part of the Station, proof satisfactory to the Station that the candidate is "legally qualified", as that term is defined by the FCC
 - (e) Where doubt exists on the part of the Station, proof satisfactory to the Station that the purchaser is authorized to buy time for the candidate.
 - (f) Applicable information to demonstrate compliance with authorization and sponsorship identification requirements of the Bipartisan Campaign Reform Act of 2002.
 - (g) Advance orders for schedules of political advertising may be subject to reconfirmation five (5) days preceding start of schedule.
 - (h) No more than two (2) spots per hour per candidate / non-candidate / issue will be accepted.
 - (i) Commercial facilities (DVD Cut in "DVD-R" format), Mini-DV, or Beta Cam SP, along with written instructions for their use, should be submitted to the Station as soon as possible to ensure proper airing. All instructions for airing of commercial facilities should be in writing. Changes to these instructions should be in writing to the Station (by letter, fax, e-mail, etc.) prior to the changes being made. DVD (Cut in "DVD-R" format), Mini-DV, or Beta Cam SP, should be received in sufficient time to permit Station confirmation of compliance with sponsorship identification requirements and with broadcast technical standards.
 - (j) Deadlines for all commercial material, time orders and contract changes to commercial materials completed and approved for 14.1, 14.2, & 14.4 are:
 - Before 1pm Monday for Wednesday's Log
 - Before 1pm on Tuesday for Thursday's Log
 - Before 1pm on Wednesday for Friday's Log
 - Before 1pm Thursday for Saturday, Sunday or Monday's Log
 - Before 1pm Friday for Tuesday's Log
 - (k) The Station does not maintain staff to accept orders or changes on the weekends.
 - (l) Confirmation of broadcast or changes to schedules as ordered will be sent to the political advertiser and placed in the Station's Public Inspection File as soon as commercially possible, but will be available upon request.
 - (m) Failure by a political advertiser to fulfill all requirements in advance of the deadlines may result in preemption of some or all announcements or programs previously cleared.
4. **Production:** The Station's production facilities reasonably will be available to produce commercials for political advertisers on the same terms as provided to commercial advertisers (5 Business Days Turnaround). On-Air Talent may not voice or appear in political spots.
 5. **Schedules:** Although the rates charged by the Station are based upon the use of :10/:15-second, :30-second, and :60-second spots, the Station will also try to accommodate requests for advertisements on non-standard lengths for federal candidates.
 6. **Make Good Policy:** The Station will use its best efforts to provide "make good" spots prior to the election for candidate "use" spots that are preempted due to technical problems, or other reasons. Although the Station's general policy is to offer all candidates "make goods" before the election, it cannot guarantee to any advertiser that the "make goods" can be provided in the time period or rotation originally ordered. If individual constraints preclude such identical scheduling, the Station will offer make goods of equivalent value. If these are not acceptable, the Station will provide credits or refunds for preempted spots.
 7. **Election Day Orders:** Political advertising will be accepted for broadcast on Election Day, depending on available inventory.
 8. **Rebates:** If a new lowest unit charge is established after a political advertiser's purchase has been made or run, the Station will rebate the overcharge to the candidate's future time purchases, as the candidate directs.
 9. **Local Public Inspection File:** The rules and regulations of the FCC require that each station maintain and permit public inspection of a complete record of all requests for broadcast time made by or on behalf of a candidate for public office, together with an appropriate notation showing the disposition made by the licensee of the requests, including whether such requests were granted and the amount charged. The disposition also includes the schedule of time purchased when the spots aired, the rates charged, and the classes of time purchased. Whenever free time is provided to a candidate, a record of the free time provided is placed in the local public inspection file. This information is available on the FCC's website. A direct link is available on the Station website @ www.whky.com.
 10. **Newscasts/News Adjacencies:** The Station permits political advertising within, and adjacent to, all the Station News programming.

11. **Station Contact:** Any of the Station's personnel will take questions and messages from candidates and their representatives, but, in order to provide maximum service to candidates and their representatives, the Station seeks to provide sales services through one and only one sales person at the Station. At the Station, actual time buys and responses to questions will be handled by:
Patty Guthrie, Sales Manager, who can be reached at **828-485-5521** or **pguthrie@whky.com**
12. The Station will be pleased to provide upon request, further information about the Stations rates, advertising policies, advertising packages, and advertising plans. The Station encourages prospective political time buyers to inquire. It is the Stations desire to furnish all appropriate information to those interested in purchasing political advertising on the station to enable you to make the most cost efficient and effective advertising decisions. This document does not constitute an offer to sell time, nor is it a contract; rather, it is a statement of the policies, which this station, in good faith, attempts to follow in connection with the sale and placement of political advertising.

Date: _____

Accepted By: _____ For: _____